

Varsh, Tess

From: Chase Stafford [REDACTED]
Sent: Wednesday, July 14, 2021 3:51 PM
To: Varsh, Tess
Subject: Comment on draft housing element plan

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Pasadena needs a lot more affordable housing. But based on the housing element draft plan, it seems like the RHNA target is not being taken seriously. Without rezoning, are we supposed to seriously believe that essentially all conceivably possible properties for residential use will be developed in this time frame? I think we need to change zoning requirements.

Linda Vista-Annandale Association

July 14, 2021

To: Planning Commission

Re: Meeting of 7/14/2021; Agenda Item 6, Draft Housing Element Review

Chair Olivas and Planning Commissioners,

The Linda Vista-Annandale Association (LVAA) submits the following comments on the Draft Housing Element.

- **Correction Required:** The Draft Pagination of the Housing Element (Draft HE) is incorrect starting with the Page on Related Plans at the beginning of the Draft.
- **Consistency.** The Draft HE asserts that it is “Consistent” with the Land Use and other Elements of the General Plan, including Parks and Recreation and Open Space. It appears to LVAA that the Draft HE Element may not be consistent with other Elements of the General Plan or consistent within itself. For example,
 - **Open Space/Parks.** Several Elements of the General Plan stress the value of Open Space and Parks to ensuring neighborhood quality of life. In proposed Goal HE-1 and Policy HE 1.6, parks and green spaces are emphasized. Yet, proposed Programs 9 (Constraints Removal) and 10 (Regulatory Incentives), and elsewhere in the Draft HE, environmental and open space policies are suggested for removal or devaluation, including waiving, or reducing considerably Residential Impact Fees – the main source of City funding along with certain Grants for parks and open space. In our opinion, more density and crowding require more parks and open space to ensure quality of like for all Pasadena residents.
 - **Design Review/CEQA.** Goal HE-1 and Policy HE Policy 1.3 stress healthy neighborhoods, and neighborhood character and scale, and housing project design excellence. Policy HE 2.3 calls out Environmental Sustainability. Program 5 provides for residential quality design review. Yet, proposed Program 9 suggests modifying or reducing the Design Review process, and reducing the Commission review process, reducing, or eliminating environmental review, and reducing the public review process, all in the interest of “streamlining”.

Just like the Land Use Element, this Draft HE has some general concept for everyone and there is a “consistent” provision for practically anything. Which policy choices should be made in a consistent manner? Excellence in design,

character, and scale? Then, effective, and enforceable Design Guidelines, rules, and ordinances, together with competent and thorough Design Review, are required, along with full public review.

- Dislocation and Gentrification; Home Ownership Policies. LVAA is concerned about increasing threats of dislocation of long-time Pasadena residents through rising land values, gentrification, the influence of corporate housing speculation, the influence, and effects of speculative housing developers with minimum interest in Affordable Housing, and California Legislative mandates threatening almost all single-family neighborhoods in Pasadena with speculative multi-unit development. Also, we support home (including condominiums) ownership as one valuable way to build generational and family wealth and are concerned about creating “permanent” renters who can see no way out and up to ownership in place of landlords. To counter all these influences that undermine Affordable Housing and neighborhood preservation and retention, LVAA supports all the Goals, Policies and Programs that support home ownership, and Affordable Housing and neighborhood preservation and retention, including Goal HE-3, and all Goal HE-3 Policies, and, Program 3 (Housing Rehabilitation) and Program 4 (Historic Preservation), and Program 5 (Housing Design) and Program 22 (Neighborhood and Community Preservation).
- Historic Preservation. LVAA supports Historic Preservation of one of the most cost effective and efficient methods of preserving Affordable Housing. It is always cheaper to maintain and preserve older homes than buy land and build new. Consider the current cost to build a new Affordable or Market Rate Unit in Pasadena. Further, such efforts maintain and preserve the character and scale of Pasadena. Therefore, we support Program 4, Historic Preservation, and suggest an additional aspect of the Program: a City-wide Survey and Data Base of all Eligible and Listed Historic residential assets so that Pasadena’s administration and programs can be better targeted and more effective.
 - Correction: The Historic Review paragraph in Program 5 (Housing Design) should be corrected to include Eligible Historic assets.
- Hillside Overlays -- Correction. Program 5 (Housing Design) skips several important Overlay zones that include Design and design-related requirements: the Hillside Overlay Zones. The LVAA Hillside Overlay Zone includes many design-related provisions and requirements. This section should be corrected.
- Hillsides Constraints. Program 9 provides proposals to remove constraints, a good deal of which are questionable. See above. But one category is ignored: necessary or required constraints. Such a constraint is the Extremely High Wildfire Danger status of Pasadena’s Hillsides including West Pasadena and

particularly the LVAA neighborhood area. Pasadena's new Fire Chief already has paid us a visit and took careful note of the extreme Wildfire danger in our hills; the narrow streets and lack of room for driving or parking; and the similarity between our area and such disaster areas as Oakland Hills. He will be suggesting soon a new Fire Emergency Plan for the Hillside in Pasadena including the Linda Vista area, and we will be working with and cooperating with him and the Fire Department. As part of this process, it is clear and we will be asserting that ADUs in the Hillside, particularly detached ADUs, must continue to be avoided and not permitted in the interests of Pasadena public safety. There is simply no room for more people, traffic, parking, emergency services, emergency egress, and such, if we are subject to a wildfire incident, particularly during a Rose Bowl event of any size, but particularly a large event. The Draft HE should reflect and consider and provide for this Hillside constraints situation.

- Program 11: ADUs; Program 15 (Affordable Housing Preservation). Other than in the Hillside for Public Safety reasons, see above, LVAA's opinion is that ADUs should not be considered effective Affordable Housing unless Deed Restricted for a considerable period to provide Affordable rents. Otherwise, ADUs should pay "full freight" including business permit and Residential Impact fees as owners profit from high Market rents. LVAA does not accept the "trickle down" Affordable Housing costs theory – the more Market rate rental units including ADUs there are, somehow affordable rents result elsewhere. Further, we support all the suggested Deed Restricted programs which should be expanded.
- Program 8: Inclusionary Housing. This Program should consider increasing Inclusionary requirements and fees. The State Density Bonus Law requires Pasadena to add an inordinate amount of Market Rate housing for the wealthy for a little bit of Affordable Housing while Developers profit off all such development to a shocking degree. LVAA supports the production of genuine Affordable Housing – not, endless Market Rate buildings out of scale and out of character destroying the charm and beauty of our City while NOT really solving our housing needs.
- Program 12: Financial Assistance; Programs 13 and 14 (Ownership and Rental assistance). LVAA supports strengthening rental and home ownership financial assistance programs and supports efforts to find and implement a continuous source or sources of such funds. The State and/or County need to review and consider restoring Tax Increment (Redevelopment) Financing which provided much needed financial assistance for Housing of all types. We oppose reducing Residential Impact Fees that support parks and open space.

- Program 24 (Resource Conservation). This program and elsewhere in the Draft HE it is asserted and assumed that Pasadena has adequate infrastructure including WATER to support all this proposed Market Rate Housing production – the “magic” of conservation. There is supposed to be no net depletion of water due to what? Endless conservation? This situation must be addressed head on – where is the water, particularly, and considering current constraints, coming from? How much will Pasadena have for all of us in the future? The Draft HE, just like other Plans before it, ignores the water situation. We cannot ignore this drought and the Draft HE must discuss and analyze water, particularly as the situation applies to the production of Market Rate Housing in exchange for so little Affordable Housing.

Thank you for your consideration of our comments and concerns.

Sincerely,

Nina Chomsky

Nina Chomsky, LVAA President

cc: LVAA Board of Directors